

Exhibit 1

Re: Butowsky v. Gottlieb et al., Case No. 4:19-cv-180 (E.D. Tex.)

From: Ty Clevenger (tyclevenger@yahoo.com)

To: blatham@jw.com; tleatherbury@velaw.com; amoore@thompsoncoe.com

Cc: megancoker@velaw.com; jjoiner@jw.com; andy@ryanlawpartners.com; mccrad@nytimes.com; tannis@thompsoncoe.com; pskiermont@skiermontderby.com; chodge@skiermontderby.com; mfuller@velaw.com

Date: Tuesday, September 24, 2019, 12:03 PM EDT

All,

My client is planning to file a petition for rehearing in the Second Circuit in Joel and Mary Rich v. Fox News Network, et al, and I've been trying to figure out the best way to proceed in Butowsky v. Gottlieb. I plan to ask the court to sever the claims against the lawyer defendants and abate that case pending the outcome in NY.

I've also received yet another threat of sanctions from Paul Skiermont if I do not withdraw the entire complaint. In his draft Rule 11 motion, I believe two points are worth addressing, but the rest range from frivolous to ludicrous. I intend to ask the court for permission to strike one sentence in the complaint and add two attachments for purposes of context.

The sentence that I wish to strike is found in Paragraph 96: "The Plaintiff alleges that [Defendant Governski] enlisted the CNN Defendants in the larger scheme to defame and discredit Mr. Butowsky with false allegations." I also wish to include the two attached documents as exhibits to the complaint with the following sentence: "the Boies Schiller Defendants have suggested that they are actively trying to subpoena Wikileaks or Julian Assange, but their own communications show that those attempts are half-hearted at best."

Please let me know if you have objections to the motion to sever, motion to abate, and/or motion to amend the complaint as set forth above. With respect to Mr. Skiermont's latest Rule 11 motion, he is hereby warned that he will face a motion for sanctions pursuant to 18 U.S.C. § 1927 if he files it.

Ty Clevenger



2019.04.19 Gottlieb letter re subpoena.pdf
254.9kB



2019.08.14 Gottlieb email re Assange.pdf
80kB